

EX PARTE OR LATE FILED

XYPOINT

August 19, 1997

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RECEIVED

AUG 25 1997

In re: CC Docket 94-102
Ex Parte Communication

FCC FILED

DOCKET FILED OFFICE

Dear Mr. Caton:

Pursuant to the provisions of Section 1.1206 of the Commission's Rules, XYPOINT Corp. ("XYPOINT") submits the following comments for inclusion in the record in the above-captioned proceedings.

AT&T Wireless Services has publicly announced its selection of a technology to meet Phase I of the FCC's wireless E911 Order as well as the corresponding price data which will be charged to Public Safety Answering Points (PSAPs). The announcement illustrates positions taken by XYPOINT in previous ex parte presentations.

AT&T Wireless Services has selected signaling system #7 (SS7) for use in a non call path associated signaling format—which is a separation of the voice and data streams—rather than a Feature Group D (FGD) method advocated by many local exchange carriers. The selection of SS7 rather than a FGD solution by AT&T Wireless Services provides the Commission with clear evidence that wireless carriers have a legitimate technical, policy and funding interest in deciding for themselves *how* to comply with the Order. If the nation's 7,000-plus PSAPs or the local exchange carriers are expressly or indirectly allowed to select which technology a wireless carrier must use to meet the requirements of the Order—as some PSAP and LEC officials argue and are currently attempting to implement—then nationwide solutions (such as the one selected by AT&T Wireless Services) will be inherently impossible.

XYPOINT maintains that CMRS carriers subject to the wireless E911 rules should have full and clear authority to offer an SS7 solution to PSAPs. If a state or local PSAP authority attempts to mandate the use of FGD, at the request of the LEC, then AT&T Wireless Services and other carriers utilizing a SS7 technical solution will in effect be prohibited from implementing the Order when in fact the carrier has met all of the formal policy conditions set by the FCC.

It also is clear that AT&T Wireless Services' decision to utilize SS7 is designed to prepare the carrier to meet the Phase II requirements, which currently are not technically feasible with a FGD solution.

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Mr. William F. Caton
August 19, 1997
Page Two

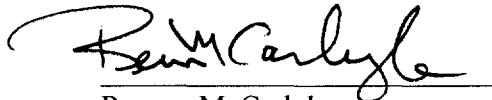
AT&T Wireless Services has announced that it will charge PSAP's that meet the criteria for Phase I implementation a one time, non-recurring fee per wireless subscriber of \$2.38, followed by a monthly charge of \$.30 per wireless subscriber. As a point of comparison, XYPOINT offers the same SS7-based non call path associated signaling with pricing along the following model: one time, non-recurring fee per PSAP of approximately \$2,000, followed by a monthly charge of \$.20 or less per wireless customer.

XYPOINT submits this comparative data as an indication to the Commission that market competition is vital to the delivery of wireless E911 services and to effective implementation of the Order. We maintain that if local exchange carriers—which currently enjoy a monopoly on the delivery of landline 911 services and which control all access that PSAPs have to the network—are allowed by the FCC to mandate to wireless carriers which type of service they must use to comply with the Order, the goals of the Order will not be met, prices will be higher and quality will suffer.

Thus, the Commission should clearly state that the intent of the Order is to be technology neutral—to allow the marketplace rather than regulators to determine how wireless carriers should meet the policy goals of the Commission.

Very truly yours,

XYPOINT Corp.


Reuven M. Carlyle
Vice President

cc: Mr. John Cimko



AT&T

ATT Wireless Services

E911

8/10/97



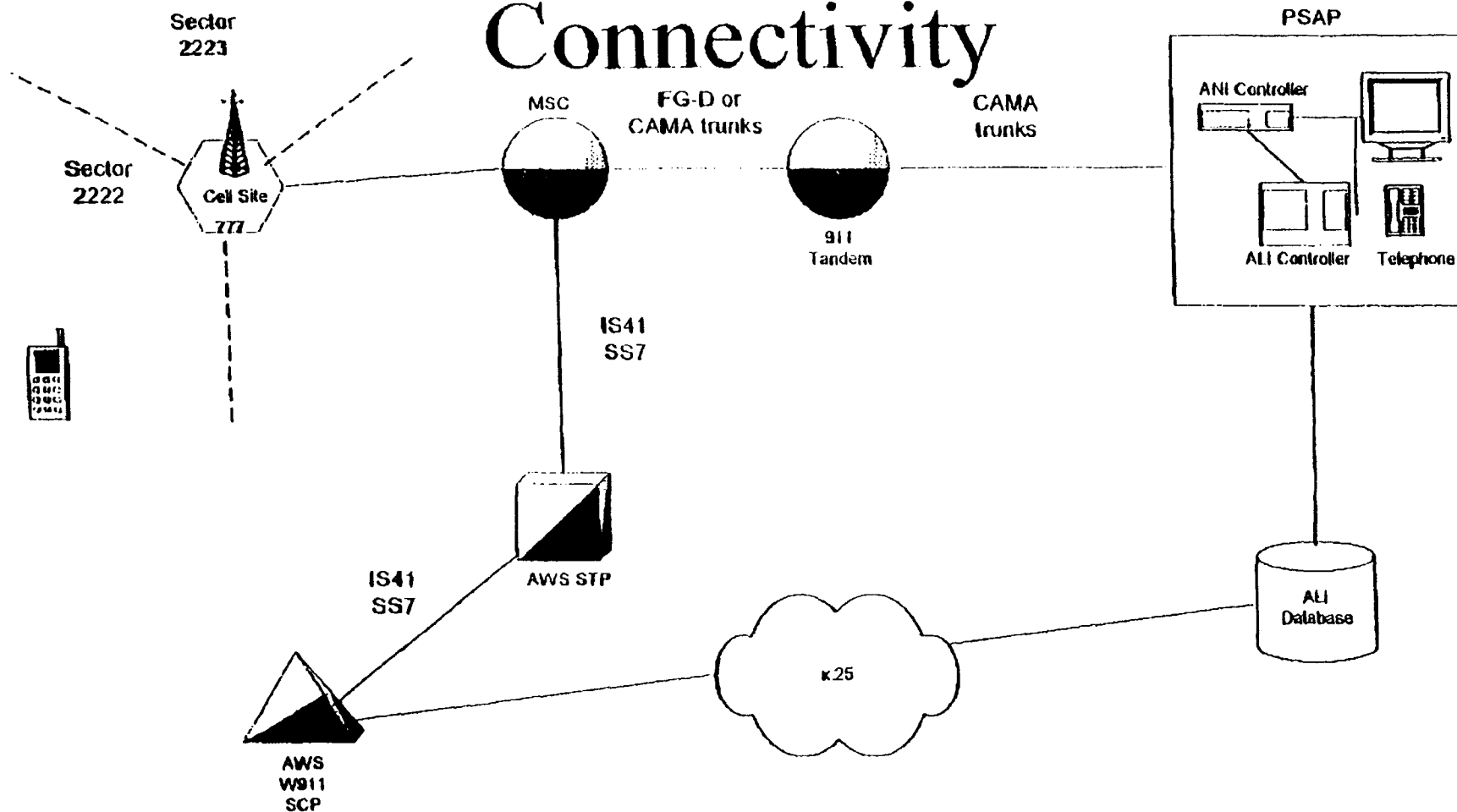
FCC Requirements

(High Level)

- April 1, 1998
 - Full 10 digit call back number
 - Cell/Sector location information
 - Support of TTY/TDD devices
 - Must process all 911 calls from mobiles transmitting a MIN
- October 1, 2001
 - Location to 125 meters, 67% of the time RMS



Network Elements & Connectivity

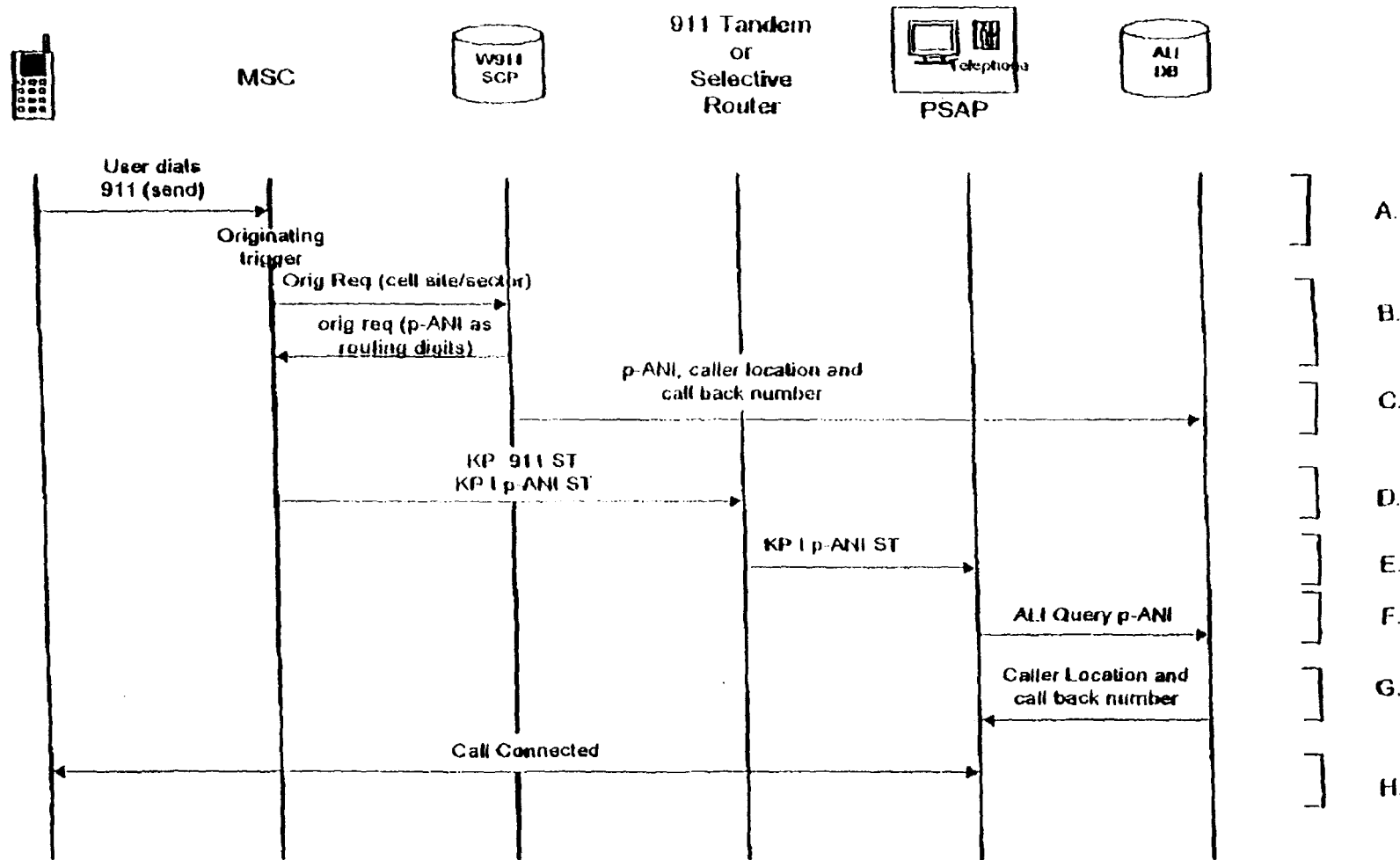


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E911 Ping-Pong Chart



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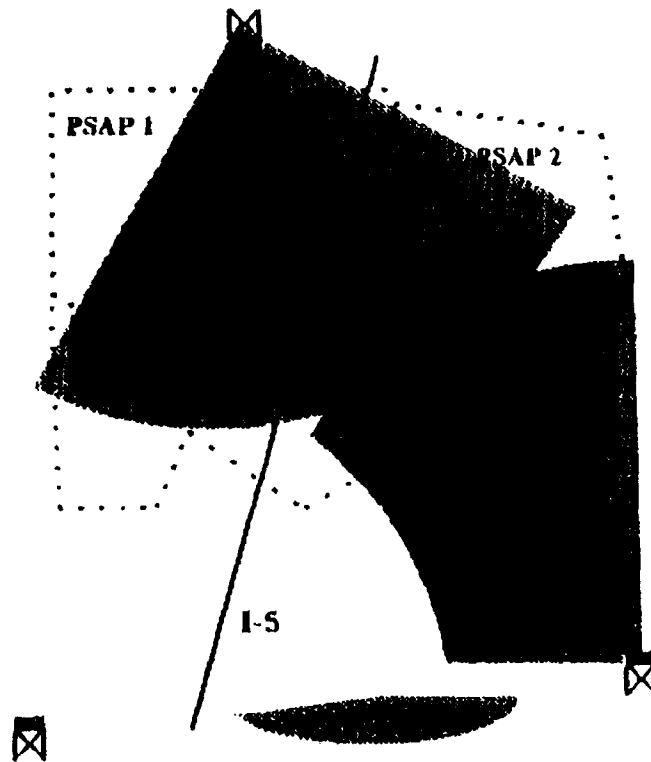


Call Flow Description

- A. The user dials a 911 call on their mobile station.
- B. The MSC receives the call and analyzes the digits and determines the digits result in an originating trigger OrigReq message. The SCP analyzes the digits in the IS41 message and determines the routing based on the cell site and sector information contained in the DigitsDialed parameter of the message. The SCP assigns a temporary number (p-ANI) and returns this number and the routing digits to the MSC.
- C. The SCP then forwards the caller location and call back number to the AII database (with the corresponding p-ANI).
- D. The call is then routed to the 911 Tandem Switch/Selective Router which then routes to the PSAP using based on the pANI.
- E. The call is routed from the 911 tandem to the PSAP over existing trunk connections.
- F. The call arrives at the PSAP and the AII database is queried for the location information using the p-ANI.
- G. The AII database returns the location information to the PSAP along with a mobile directory call back number.
- H. The call is connected to the PSAP operator.



Cell Coverage to PSAP Mapping



1-to-1 Mapping of Cell
Area to PSAP Based
on:

- Preponderance of area
- Major highways
- Major structures
- Other ?



Summary

- Separate voice and data paths
- Uses existing signaling methods and CPE
- Continues to work as network upgrades



AT&T Wireless Services E911 Financial Cost Recovery



Allocation to the PSAPs

- Costs will be allocated to the PSAPs based on the number of subscribers at year end 1997.
- Quarterly adjustments will account for varying growth rates and new market launches.
 - The NRE fee will be fixed to the 1997 distribution.
 - Monthly payments will be adjusted
- The following are estimated costs based on 1997 year end expectations of the number of customers and expenses:

NRE Fee/
per subscriber

\$2.38

Monthly Charge/
per subscriber

\$0.30